

# **EXHIBIT A**

ERIKA LEE  
JUNE 26, 2025

JOB NO. 1785866

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ERIKA LEE,

Plaintiff,

-against-                      Docket No.  
                                         1:22-cv-8618-DEH-RWL

DELTA AIR LINES, INC, DAVID NEEDHAM & JOSE  
ROSADO,

Defendants.

. . . . . X

101 Park Avenue  
New York, New York

June 26, 2025  
9:45 a.m.

CONTINUED EXAMINATION BEFORE TRIAL of  
ERIKA LEE, the Plaintiff, taken on behalf of the  
Defendant, pursuant to Order, held before a  
Notary Public of the State of New York.

ERIKA LEE  
JUNE 26, 2025

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1  
2 medical provider for any of the alleged  
3 emotional distress?

4 A. Not as of yet, I'm waiting.

5 Q. Have you ever received treatment  
6 from a medical provider for the alleged  
7 emotional distress?

8 A. Yes, I have. Dr. Shah and Dr.  
9 Michaels, you have my medical records from them.

10 Q. Any other doctors?

11 A. No.

12 Q. Any social workers?

13 A. No.

14 Q. Any counselors?

15 A. No.

16 Q. Any therapists?

17 A. No.

18 Q. What kind of medicine does Dr. Shah  
19 practice?

20 A. He is the psychiatrist. He is the  
21 one who writes the prescriptions. Dr. Michael  
22 is the psychotherapist, and I have not been able  
23 to see them in almost a year.

24 Q. When was the last time that you saw  
25 Dr. Shah?

ERIKA LEE  
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C E R T I F I C A T E

STATE OF NEW YORK )  
 ) ss:  
COUNTY OF NEW YORK )

I, STACY ADAMES, a Shorthand Reporter  
and Notary Public within and for the State of  
New York, do hereby certify:

That ERIKA LEE, the witness whose  
EXAMINATION BEFORE TRIAL was held  
on June 26, 2025, as hereinbefore set forth, was  
duly sworn by me, and that this transcript of  
such Examination is a true and accurate record  
of the testimony given by such witness, to the  
best of my ability.

I further certify that I am not related to any of the parties to this action by blood or by marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 26th day of June, 2025.

*Stacy Adames*  
STACY ADAMES